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6	Attorneys for Defendants	
7	IN THE UNITED STATES DISTRICT COURT	
8		
9	EASTERN DISTRICT OF CALIFORNIA	
10	IBRAHIM KADHIM,	CASE NO. 2:23-CV-01318 AC
11	Plaintiff,	STIPULATION AND [PROPOSED] ORDER FOR FIFTH EXTENSION OF TIME
12	v.	THE THE EXTENSION OF THAT
13	ROHIT NEPAL, ET AL.,	
14	Defendants.	
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16		
17	The Defendants respectfully request a fifth extension of time in which to respond to the	
18	Complaint, and counsel for Plaintiff does not oppose. This case concerns the visa applications of	
19	Plaintiff's daughter and grandson. The visa cases of Plaintiff's relatives were refused for administrative	
20	processing, following a September 2022 consular interview. The administrative processing of Plaintiff's	
21	daughter's case was recently completed, and, on March 12, 2024, the consular officer issued the visa	
22	application of Plaintiff's daughter. The administrative processing of the derivative beneficiary,	
23	Plaintiff's grandson, remains ongoing for additional security screening. The parties anticipate that this	
24	lawsuit will soon be rendered moot once the administrative processing of remaining visa application has	
25	been complete.	
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1	The parties therefore stipulate that the new date for Defendants to file an answer or other	
2	dispositive pleading is May 29, 2024. The parties further request that all other filing deadlines be	
3	similarly extended.	
4		
5	Respectfully submitted,	
6		
7	Dated: April 26, 2024 PHILLIP A. TALBERT United States Attorney	
8	United States Attorney	
9	By: /s/ ELLIOT C. WONG ELLIOT C. WONG	
10	Assistant United States Attorney	
11		
12	/s/ JOSHUA L. GOLDSTEIN	
13	JOSHUA L. GOLDSTEIN Counsel for Plaintiff	
14		
15	[PROPOSED] ORDER	
16	It is so ordered.	
17		
18	Dated: April 30, 2024	
19	ALLISON CLAIRE	
20	UNITED STATES MAGISTRATE JUDGE	
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